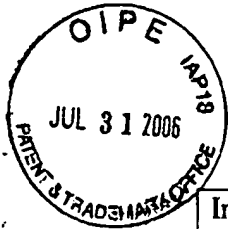


RPS920010046 (44458-P015US)

PATENT



- 1 -

BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of: Goodman et al.	:	Before the Examiner: Chai, Longbit
Serial No.: 09/931,629	:	Group Art Unit: 2131
Filing Date: August 16, 2001	:	
Title: FLASH UPDATE USING A TRUSTED PLATFORM MODULE	:	Lenovo (United States) Inc. ZHHA/B675/B424 P.O. 12195 3039 Cornwallis Road Research Triangle Park, NC 27709

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Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

In response to the Examiner's Answer having a mailing date of May 26, 2006,
Appellants respond as follows:

The Examiner is asserting that the claims are obvious by combining the
Grawrock reference with the *Alexander* reference. In order to do so, the *prima facie*
case of obviousness has to show that one skilled in the art at the time the invention
was made would have been motivated to combine these two references. Appellants

CERTIFICATION UNDER 37 C.F.R. § 1.8

I hereby certify that this correspondence is being deposited with the United States Postal Service with
sufficient postage as first class mail in an envelope addressed to Mail Stop Appeal Brief - Patents,
Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on July 26, 2006.

Danielle Chandler
Signature
Danielle Chandler
(Printed name of person certifying)